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15 *Ultimate Fighting Championship and UFC*

16  
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
21 on behalf of themselves and all others similarly  
situated,

22 Plaintiffs,

v.

23 Zuffa, LLC, d/b/a Ultimate Fighting  
24 Championship and UFC,

25 Defendant.

26 No.: 2:15-cv-01045-RFB-BNW

27  
28 **DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF JOINT  
MOTION TO CONDITIONALLY  
FILE UNDER SEAL PLAINTIFFS'  
OBJECTIONS TO DEFENDANT  
ZUFFA, LLC'S PROPOSAL TO  
INTRODUCE CERTAIN  
PURPORTED "SUMMARY  
EXHIBITS" AT THE HEARING  
CONCERNING PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION AND RELATED  
MATERIALS**

1 I, Stacey K. Grigsby, declare as follows:

2       1. I am a member in good standing of the bar of the District of Columbia and the bar of  
 3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in  
 4 the law firm Boies Schiller Flexner LLP (“BSF”) and counsel for Zuffa, LLC (“Zuffa”) in the above-  
 5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.  
 6 2:15-cv-01045-RFP-BNW.

7       2. I make this declaration in support of the Joint Motion to Conditionally File Under  
 8 Seal Plaintiffs’ Objections to Zuffa, LLC’s Proposal to Introduce Certain Purported “Summary  
 9 Exhibits” at the Hearing Concerning Plaintiffs’ Motion for Class Certification and Related Materials  
 10 filed on behalf of Zuffa and Plaintiffs (together, the “Parties”). Based on my personal experience,  
 11 knowledge, and review of the files, records, and communications in this case, I have personal  
 12 knowledge of the facts set forth in this Declaration and, if called to testify, could and would testify  
 13 competently to those facts under oath.

14       3. When Zuffa filed Exhibit 92 to its Opposition to Class Certification, it filed a partially  
 15 redacted form of the exhibit. ECF No. 540-96. Though Plaintiffs filed this document entirely under  
 16 seal, Zuffa does not seek to alter the redactions as they exist in the version currently on the docket at  
 17 ECF No. 540-96.

18       4. Exhibit A to this Declaration is a true and correct copy of Summary Exhibit No. 1  
 19 (referred to in Plaintiffs’ papers as “SE1” and listed on the Parties’ Combined List of Joint, Plaintiff,  
 20 and Zuffa Exhibits (“Exhibit List”), ECF No. 662-2 as “ZCCX296”), produced by Zuffa on May 24,  
 21 2019.

22       5. Exhibit B to this Declaration is a true and correct copy of Summary Exhibit No. 3  
 23 (referred to in Plaintiffs’ papers as “SE3” and listed on the Parties’ Exhibit List as “ZCCX302”),  
 24 produced by Zuffa on May 24, 2019, with appropriate redactions.

25       6. Exhibit C to this Declaration is a true and correct copy of Summary Exhibit No. 6  
 26 (referred to in Plaintiffs’ papers as “SE6” and listed on the Parties’ Exhibit List as “ZCCX305”),  
 27 produced by Zuffa on May 24, 2019.

28       7. Exhibit D to this Declaration is a true and correct copy of Summary Exhibit No. 7

(referred to in Plaintiffs' papers as "SE7" and listed on the Parties' Exhibit List as "ZCCX306"), produced by Zuffa on May 24, 2019.

8. Exhibit E to this Declaration is a true and correct copy of Summary Exhibit No. 11 (referred to in Plaintiffs' papers as "SE11" and listed on the Parties' Exhibit List as "ZCCX298"), produced by Zuffa on May 24, 2019, with appropriate redactions.

9. Exhibit F to this Declaration is true and correct copy of Plaintiffs' Objections to Defendant Zuffa, LLC's Proposal to Introduce Certain Purported "Summary Exhibits" at the Hearing Concerning Plaintiffs' Motion for Class Certification, filed on June 14, 2019 (ECF No. 658) that was previously filed under seal. Exhibit F contains no redactions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 19th day of June, 2019 in Washington, DC.

/s/ Stacey K. Grigsby

Stacey K. Grigsby